



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RTP/EDP
F. #2019R00033

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 4, 2024

By ECF

The Honorable William F. Kuntz II
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Motovich et al, 21-CR-497

Dear Judge Kuntz:

The government and defense counsel for the three defendants (collectively, “the parties”) respectfully submit the following proposed calendar for the Court’s consideration in connection with the above-referenced trial, currently scheduled to commence with jury selection on June 10, 2024. The parties have agreed to all proposed dates, with one exception—the date by which the government shall produce material pursuant to 18 U.S.C. § 3500 (“3500 material”), as is noted below.

- Oral argument on motions – Previously set for March 21, 2024, 1:30 pm
- **PROPOSED Suppression hearing (if necessary) – April 2, 2024, 9:30 am**
- Government expert disclosures – April 26, 2024
- Govt’ Rule 404(b) Notice – April 26, 2024
- Defense expert disclosures – May 3, 2024
- Motions in limine – May 10, 2024
- Government response expert disclosures (if applicable) – May 17, 2024
- Government produces 3500 material – May 20, 2024*
- Government produces witness list – May 20, 2024
- Government produces exhibit list – May 20, 2024
- Proposed jury instructions – May 24, 2024
- Proposed voir dire questions – May 24, 2024
- Parallel responses to motions in limine – May 24, 2024
- Parallel replies re: motions in limine – May 29, 2024
- **PROPOSED Pretrial conference – Week of June 3, 2024**
- Defendants’ witness and exhibit lists – June 7, 2024
- Jury selection – June 10, 2024

